

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
JOY CHEN
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Joy_Chen@fd.org
6 Attorney for Heath James MacCurdy
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 HEATH JAMES MACCUDY,
15 Defendant.

Case No. 2:20-cr-00277-GMN-NJK

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting
18 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,
20 Assistant Federal Public Defender, counsel for Kimberly M Frayn, that the Revocation Hearing
21 currently scheduled on February 19, 2025, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties have conferred with Mr. MacCurdy's supervising probation officer
25 and understand that Mr. MacCurdy recently completed his intake for an inpatient treatment
26 program and is set to begin the program soon. That program is expected to last approximately
30 days.

1 2. The parties therefore respectfully request that this Court continue Mr.
2 MacCurdy's revocation hearing by 45 days to allow him time to complete his inpatient
3 treatment program.

4 3. The defendant is out of custody and does not oppose the continuance.

5 This is the first request for a continuance of the revocation hearing.

6 DATED this 13th day of February, 2025.

7
8 RENE L. VALLADARES
9 Federal Public Defender

 SUE FAHAMI
 Acting United States Attorney

10 By /s/ Joy Chen

 By /s/ Kimberly M. Frayn

11 JOY CHEN
12 Assistant Federal Public Defender

 KIMBERLY M. FRAYN
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 HEATH JAMES MACCURDY,
7 Defendant.
8

Case No. 2:20-cr-00277-GMN-NJK

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Wednesday, February 19, 2025 at 10:00 a.m., be vacated and continued to April 8, 2025 at
12 the hour of 10:00 a.m.

13 DATED this 17 day of February, 2025.

14
15 
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26